

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	:	PROMESA
	:	Title III
as representative of	:	Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
Debtors. ¹	:	

X

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS' JOINDER TO AMBAC
ASSURANCE CORPORATION'S MOTION FOR ORDER DIRECTING CASH RULE
2004 DISCOVERY FROM FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO**

To the Honorable United States Magistrate Judge Judith Gail Dein:

The Official Committee of Unsecured Creditors (the “Committee”)² hereby file this joinder (the “Joinder”) to *Ambac Assurance Corporation’s Motion for an Order Directing Cash Rule 2004 Discovery from the Financial Oversight and Management Board for Puerto Rico* [Dkt. No. 15220] (the “Rule 2004 Motion”). In support of this Joinder, the Committee respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

1. The Committee files this Joinder in the Rule 2004 Motion to request that it be permitted to receive any and all documents or information produced by the Oversight Board, AAFAF, the Commonwealth or any other individual or entity as a result of the Rule 2004 Motion. The Committee also requests the ability to participate in any meet and confer process related to the Rule 2004 Motion.

2. The Commonwealth's creditors need transparency into its financial condition to fully evaluate its proposed plan of adjustment and to understand the full range of Commonwealth assets available to pay its creditors. The Committee and its constituents are entitled to this information to the same extent as Ambac and other creditors.

3. The Committee previously filed a joinder in support of Ambac's original Rule 2004 motions. *Joinder of Official Committee of Unsecured Creditors in Ambac Assurance Corporation's Motions for Rule 2004 Discovery Concerning Commonwealth Assets [ECF No. 9022] and Commonwealth Cash Restriction Analysis [ECF No. 9023]* [Dkt. No. 10425]. In a February 12, 2020 informative motion, Ambac, the Oversight Board, and AAFAF informed the Court that they had voluntarily permitted the Committee to participate in any meet and confer sessions on the original Rule 2004 motions, and that they did not object to the Committee's continued participation in the future. *Joint Status Report of Movant Ambac Assurance Corporation and Respondents the Financial Oversight and Management Board for Puerto Rico, As Representative of the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority With Respect to the Rule 2004 Motions* [Dkt. No. 10875].

4. The Committee reserves its right to independently seek Rule 2004 discovery, or any other discovery, from the Oversight Board, AAFAF, the Commonwealth, or any other individual or entity.

Dated: November 25, 2020

/s/ Luc A. Despins.

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- and -

/s/ Juan J. Casillas Ayala

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